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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ELLEN F. ROSENBLUM, Oregon Attorney
General,

Plaintiff,

v.

JOHN DOES 1-10; the UNITED STATES
DEPARTMENT OF HOMELAND
SECURITY; UNITED STATES CUSTOMS
AND BORDER PROTECTION; the UNITED
STATES MARSHALS SERVICE and the
FEDERAL PROTECTIVE SERVICE,

Defendants.

Case No. 3:20-cv-01161-MO

DECLARATION OF JENNIFER ARNOLD

1. My name is Jennifer S. Arnold. I make this declaration in support of Oregon Attorney General Ellen Rosenblum's Motion for Temporary Restraining Order in the above captioned action.

2. I am a resident of the State of Oregon and have been since 1999. I currently reside in Multnomah County. I am a registered nurse employed by a major regional medical provider. My duties include providing support to patients being tested for and diagnosed with the novel coronavirus, COVID-19, and I am considered an “essential worker”.

3. I am currently the sole provider for my household as my spouse has become unemployed as a result of the COVID-19 pandemic.

4. I have participated in Women's Marches, Reproductive Health, and LGBTQIA (Pride) Marches/Events in Portland, Oregon. During such events I have felt safe in the exercise of my rights to assemble and express my views on political, cultural, and social matters. A number of people of my acquaintance participated in protests in downtown Portland on July 19, 2020, including in the peaceful gathering known as the “Wall of Moms”. I wished to participate to support the Black Lives Matter activists in their efforts to end police brutality but chose not to participate due to fear of detention.

5. On or about July 17, 2020 I learned via social media and news reports that multiple armed, unidentified individuals with military or quasi-military equipment detained an unarmed, non-resisting pedestrian in downtown Portland, forced him into an unmarked vehicle, and departed without identifying themselves to the individual detained, or bystanders.

6. I have seen video of an individual being abruptly detained on the streets of Portland by unidentified armed men.

7. Since that time I have learned additional information indicating that the armed persons who detained the pedestrian were employed by one or more federal agencies.

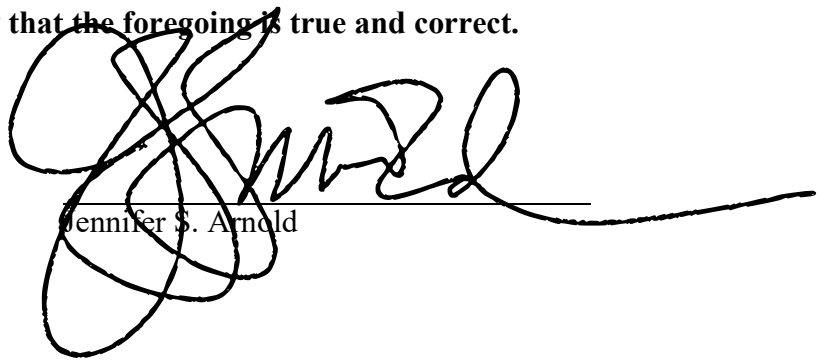
8. I do not feel comfortable with the risk of being abruptly detained for an indefinite period because I am the sole provider financial provider for my spouse and children. Any disruption to my employment would be disastrous for my family. In addition, the nature of my work providing support to vulnerable Oregonians means the impact of my possible detention and

unavailability to perform my job would affect people in particular need of medical services during the pandemic.

9. The lack of explanation given for detaining pedestrians, the unidentified armed individuals, and unmarked vehicle associated with the events above causes me to fear being in the vicinity of the federal courthouse during BLM and anti-police brutality events and assemblies.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on July 20, 2020.



Jennifer S. Arnold